

BELLON & MANINGO, LTD.
 732 SOUTH SIXTH STREET, SUITE 102
 LAS VEGAS, NEVADA 89101
 702-452-6299 • 702-452-6298 FAX

BELLON & MANINGO, LTD.
 LANCE A. MANINGO, ESQ.
 Nevada Bar No. 6405
 732 S. Sixth Street, Suite 102
 Las Vegas, Nevada 89101
 Telephone: (702) 452-6299
 Facsimile: (702) 452-6298
 Email: lam@bellonandmaningo.com
 Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)	
)	2:12-CR-0004-APG-GWF
Plaintiff,)	
)	
vs.)	
)	
ANDREI BOLOVAN,)	
)	
Defendant.)	
_____)	

STIPULATION AND ORDER FOR INMATE TO HAVE ACCESS TO DISCOVERY

IT IS HEREBY STIPULATED by and between Kimberly Frayn, Assistant United States Attorney, counsel for the United States of America, and Lance A. Maningo, of Bellon & Maningo, Ltd., counsel for Defendant ANDREI BOLOVAN, that Defendant, who is currently detained in Nevada Southern Detention Center, is allowed access to computers, not connected to the internet, which would allow for defense counsel to provide an external hard drive(s) allowing Defendant to review discovery. Defendant will not take notes during the viewing of the discovery or print any of the material.

This stipulation is in connection with the Revised Order signed by the Court on June 12, 2013, Document 386. Counsel requests that Defendant be added to that Revised Order:

BELLON & MANINGO, LTD.

732 SOUTH SIXTH STREET, SUITE 102
LAS VEGAS, NEVADA 89101
702-452-6299 • 702-452-6298 FAX

1
2 David Ray Camez (2:12-cr-00004)

3 Makyl Haggerty (2:12-cr-00004)

4 Cameron Harrison (2:12-cr-00004)

5 Alexander Kostikov (2:12-cr-00004)

6 Qasir Mukhtar (2:12-cr-00004)

7 Michael Lofton (2:12-cr-00004)

8 Elias Lee Samaha (2:12-cr-00004)

9 Jason MacLaskey (2:12-cr-00083)

10 Omar Butt (2:12-cr-00083)

11 Jonathan Vergnetti (2:12-cr-00084)

12 Thomas Lamb (2:12-cr-00084)

13 Michael San Clemente (2:13-cr-00120)

14 Daisy Martinez (2:13-cr-00120)

15 Irina Sanford (2:13-cr-00120)

16 RESPECTFULLY SUBMITTED this 9th day of June, 2014.

17 Bellon & Maningo, Ltd

United States of Attorney

18
19
20
21 By: /s/ Lance Maningo
22 LANCE A. MANINGO, ESQ.
23 Attorney for Defendant

By: /s/ Kimberly Frayn
KIMBERLY FRAYN, AUSA
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)
) 2:12-CR-0004-APG-GWF
 Plaintiff,)
)
 vs.)
)
 ANDREI BOLOVAN,)
)
 Defendant.)
 _____)

ORDER

IT IS THEREFORE ORDERED that the following Defendant, detained in Nevada Southern Detention Center, may have access to computers, not connected to the internet, which would allow for defense counsel to provide an external hard drive(s) allowing Defendant to review discovery.

IT IS FURTHER ORDERED that Defendant is not to take notes during his viewing of the discovery or print any of the material.

DATED this ____ day of _____, 2014.

MAGISTRATE JUDGE FOLEY, JR.

Respectfully submitted by:

/s/ Lance Maningo
BELLON & MANINGO, LTD.
LANCE A. MANINGO, ESQ.
Nevada Bar No.: 006405
732 S. Sixth Street, Suite 102
Las Vegas, Nevada 89101
Attorney for Defendant